

UNITED STATES DISTRICT COURT

DISTRICT OF NEW MEXICO

FILED

UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

CRIMINAL COMPLAINT

vs.

Krisohn Adakai: DOB 1991

JUL 31 2012

Case Number:

12mj1767

MATTHEW J. DYKMAN

(Name and Address of Defendant)

CLERK

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about July 28, 2012 in San Juan County, in

(Date)

the State of New Mexico and District of New Mexico defendant(s) did,

(Track Statutory Language of Offense)

commit murder

in violation of Title 18 United States Code, Section(s) 1111

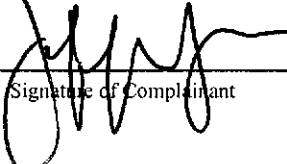
I further state that I am a(n) Criminal Investigator and that this complaint is based on the
Official Title

following facts:

See Attached Affidavit hereby incorporated by reference as if fully restated herein.

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No



Signature of Complainant

Printed Name of Complainant

Sworn to before me and signed in my presence,

7-31-12

Date

ROBERT HAYES SCOTT

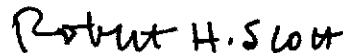
UNITED STATES MAGISTRATE JUDGE

Name and Title of Judge

at

ALBUQUERQUE, NEW MEXICO

City and State



Signature of Judge

1 MB/AUSA

2 NEW MEXICO

3 ALBUQUERQUE, NEW MEXICO

4 United States of America)

5 vs)

6 KRISOHN ADAKAI
7 DATE OF BIRTH: 1991)
8 Social Security Number XXX-XX-3173

9 AFFIDAVIT

10
11 1) I AM A REGULARLY APPOINTED CRIMINAL INVESTIGATOR FOR THE
12 NAVAJO NATION POLICE DEPARTMENT AND INVESTIGATE CRIMES ON THE NAVAJO
13 INDIAN RESERVATION. THE FOLLOWING FACTS WERE DETERMINED DURING THE COURSE
14 OF AN INVESTIGATION CONDUCTED BY AGENTS OF THE FBI AND NAVAJO POLICE
DEPARTMENT CRIMINAL INVESTIGATORS AND COMMUNICATED TO ME.

15
16 2) THE VICTIM, WITNESSES, AND SUBJECTS INVOLVED IN THIS
INVESTIGATION WILL BE HEREINAFTER REFERRED TO AS FOLLOWS:

17
18 A. Victim

19 1. CRYSTAL TOM, age 26 ("CRYSTAL" - Year of Birth: 1985)

20 B. Subject

21 1. KRISOHN ADAKAI, age 20 ("KRISOHN" - Year of Birth:
22 1991).

23 C. WITNESS

24 1. HERBERT CHARLEY, ("HERBERT")

25 3) ON 07/30/2012 THE NAVAJO POLICE DEPARTMENT IN SHIPROCK,
26 NEW MEXICO WAS CONTACTED BY FAMILY MEMBERS OF CRYSTAL, WHO DESCRIBED THAT
27 SHE HAD BEEN MISSING SINCE SATURDAY, JULY 28, 2012. THE FAMILY HAD REASON
28 TO BELIEVE THAT KRISOHN, WHO IS A FRIEND OF CRYSTAL THAT LIVES IN
BECLABITO, NEW MEXICO, WAS THE LAST PERSON TO BE WITH HER.

1 4) IN THE MORNING OF 07/30/2012, HERBERT CHARLEY, WHO IS AN
2 UNCLE OF KRISOHN, WENT TO NHA HOUSING #8, IN BECLABITO, NM, WHERE KRISOHN
3 WAS LIVING. HERBERT HAD A CONVERSATION WITH KRISOHN REGARDING THE
4 WHEREABOUTS OF CRYSTAL. KRISOHN STARTED CRYING AND STATED THAT CRYSTAL
5 WAS "GONE". HERBERT ASKED WHERE CRYSTAL WENT AND KRISOHN STATED "AREA 7".
6 KRISOHN STATED THAT SHE HAD GOTTEN INTO A FIGHT WITH CRYSTAL AND THAT
7 CRYSTAL WENT "CRAZY". KRISOHN STATED THAT SHE WAS "SORRY" AND "DIDN'T
8 MEAN TO DO IT" AND "DIDN'T MEAN FOR IT TO HAPPEN".

9 5) THE FBI AND CRIMINAL INVESTIGATIONS OFFICE CONTACTED
10 KRISOHN FOR AN INTERVIEW. KRISOHN STATED THAT ON SATURDAY EVENING SHE HAD
11 BEEN DRINKING ALCOHOL WITH CRYSTAL AT HER HOUSE IN BECLABITO, NEW MEXICO.
12 KRISOHN AND CRYSTAL WERE THE ONLY PEOPLE HOME. AN ARGUMENT AND FIGHT
13 BROKE OUT BETWEEN THEM OVER ISSUES THAT THEY HAD BOTH BEEN SEXUALLY
14 MOLESTED. KRISOHN STATED THAT SHE HAD A BLACK HANDLE, FIXED BLADE KNIFE
15 IN THE ROOM, AND REMEMBERED HAVING THE KNIFE IN HER HAND DURING THE
16 FIGHT. AT SOME POINT, KRISOHN TACKLED CRYSTAL AND GOT ON TOP OF HER SO
17 SHE COULDN'T MOVE HER ARMS. IT WAS FROM THIS POSITION THAT KRISOHN WAS
18 HITTING HER IN THE FACE, BUT SHE DIDN'T REMEMBER HAVING THE KNIFE IN HER
19 HAND. AFTER CRYSTAL STOPPED FIGHTING BACK, KRISOHN GOT OFF OF HER AND
20 WENT TO BED. KRISOHN DOESN'T REMEMBER ANYTHING ELSE UNTIL APPROXIMATELY
21 8:00 AM SUNDAY MORNING, JULY 29. WHEN SHE WOKE UP SHE SAW BLOOD ALL OVER
22 THE FLOOR, HER FACE, HANDS, AND SAW HEAVY BLEEDING FROM CRYSTAL'S HEAD,
23 WHO WAS APPARENTLY DEAD. THE KNIFE WAS LYING ON THE FLOOR NEXT TO HER
24 BED. KRISOHN ALSO NOTICED THAT SHE HAD A LARGE CUT ON HER HAND THAT SHE
25 ASSUMED CAME FROM CRYSTAL. KRISOHN BELIEVES THAT IT WAS POSSIBLE THAT SHE
26 STABBED CRYSTAL.

27 6) KRISOHN THEN BEGAN TO CLEAN UP ALL THE BLOOD AND GATHER
28 THE BOTTLES OF ALCOHOL. THERE WERE ALSO RUGS IN THE ROOM WITH BLOOD
STAINS THAT SHE ROLLED UP AS WELL. SHE CUT THE BLOOD SOAKED CLOTHING OFF
OF CRYSTAL AND PUT IT INTO THE PLASTIC BAG WITH THE ALCOHOL BOTTLES,
CLEANING ITEMS, AND OTHER BLOOD STAINED ITEMS. KRISOHN THEN WALKED OVER
TO HER GRANDMA'S HOUSE TO BORROW HER CAR. KRIS TOLD HER GRANDMA THAT SHE
NEEDED TO BORROW THE CAR TO GO TO THE SHIPROCK HOSPITAL TO RECEIVE
TREATMENT FOR THE CUT ON HER HAND THAT SHE RECEIVED FROM A PIECE OF
METAL.

1 7) KRISOHN THEN LOADED CRYSTAL'S BODY INTO THE TRUNK OF HER
2 GRANDMA'S CAR ALONG WITH THE ITEMS SHE PUT INTO THE PLASTIC BAG AND THE
3 ROLLED UP RUGS WITH BLOOD ON THEM. THE KNIFE WITH THE BLACK HANDLE WAS
4 LEFT INSIDE HER BEDROOM. SHE THEN DROVE THE VEHICLE TO "AREA 7", WHICH IS
5 DESCRIBED AS A REMOTE AREA 10 MILES WEST OF SHIPROCK ON FARM ROAD. SHE
6 DROPPED OFF THE BODY, THE PLASTIC BAG FILLED WITH ITEMS, AND THE RUGS IN
7 THREE SEPARATE LOCATIONS AT APPROXIMATELY 11:00 AM ON SUNDAY MORNING. SHE
8 THEN DROVE TO FARMINGTON AND GOT TREATMENT FOR HER HAND AT THE SAN JUAN
9 MEDICAL CENTER, URGENT CARE FACILITY IN FARMINGTON, NEW MEXICO.

10 8) KRISOHN AGREED TO DRIVE INVESTIGATORS TO THE LOCATIONS
11 WHERE SHE DROPPED OFF EACH OF THE ITEMS AND CRYSTAL. DURING THE COURSE OF
12 DRIVING ON FARM ROAD, KRISOHN TOOK INVESTIGATORS TO "AREA 7" LOCATIONS
13 WHERE APPARENT BLOOD STAINED RUGS WERE FOUND, A PLASTIC BAG CONTAINING
14 ALCOHOLIC BOTTLES, BLOOD COVERED ITEMS, AND TO THE BODY OF CRYSTAL TOM.
15 CRYSTAL WAS FOUND LYING NAKED IN THE TREES WITH BLUE JEANS PULLED DOWN
16 AROUND HER ANKLES. THE APPROXIMATE GPS COORDINATES IS N 36.53.820', W
17 108.52.153'. KRISOHN STATED THAT SHE TRIED TO FIND AN AREA THAT SHE HAD
18 NEVER BEEN TO TAKE THE ITEMS AND CRYSTAL'S BODY.

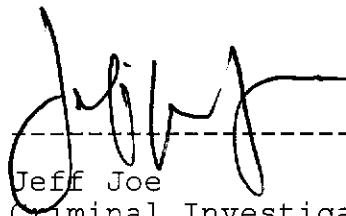
19 9) A FEDERAL SEARCH WARRANT FOR THE RESIDENCE OF NHA HOUSING
20 #8, BECLABITO, NEW MEXICO, WHERE KRISOHN LIVED WAS OBTAINED ON
21 07/30/2012. RESULTS OF THE SEARCH IDENTIFIED BLOOD LIKE SUBSTANCES ON ALL
22 FOUR WALLS OF THE BEDROOM, BLOOD ON THE FURNITURE, BLOODY CLOTHES, AND A
23 BLOODY EAR GAUGE. ALSO FOUND DURING THE SEARCH WAS A KNIFE WITH A BLACK
24 HANDLE WITH APPARENT BLOOD AND A BLACK TRASH BAG WITH BLOOD SOAKED
25 PILLOWS AND OTHER ITEMS WITH APPARENT BLOOD. THE BEDROOM HAD THE
26 APPEARANCE OF BEING RECENTLY CLEANED.

27 10) ANNA MAE CHARLEY, WHO IS THE GRANDMOTHER OF KRISOHN, AND
28 LIVES AT NHA #8, IDENTIFIED THE BLACK HANDLED KNIFE FOUND FROM THE SEARCH
AS KRISOHN'S KNIFE. ANNA MAE STATED THAT KRISOHN WOULD FREQUENTLY SHARPEN
THE KNIFE.

 11) A CHECK OF NAVAJO NATION ENROLLMENT RECORDS, SHOW KRISOHN
AND CRYSTAL ARE ENROLLED MEMBERS OF THE NAVAJO INDIAN TRIBE. THE
LOCATION OF THE MURDER, DESCRIBED AS NHA HOUSING #8, BECLABITO, NEW

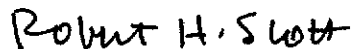
1 MEXICO, IS LOCATED WITHIN THE EXTERIOR BOUNDARIES OF THE NAVAJO INDIAN
2 RESERVATION. THE LOCATIONS WHERE CRYSTAL'S BODY WAS RECOVERED IS ALSO
3 LOCATED WITHIN THE EXTERIOR BOUNDARIES OF THE NAVAJO INDIAN RESERVATION.

4 12) BASED ON THE ABOVE, YOUR AFFIANT SUBMITS, PROBABLE CAUSE
5 EXISTS TO BELIEVE KRISOHN ADAKAI, AN INDIAN PERSON, COMMITTED THE
6 FOLLOWING OFFENSES: MURDER, THE UNLAWFUL KILLING OF A HUMAN BEING WITH
7 MALICE AFORETHOUGHT, THAT IS SHE MURDERED, CRYSTAL TOM, AN INDIAN PERSON,
8 BY STABBING HER WITH A KNIFE, IN VIOLATION OF TITLE 18, UNITED STATES
9 CODE 1111; AND THAT THE OFFENSE OCCURRED IN INDIAN COUNTRY, TO WIT THE
10 NAVAJO INDIAN RESERVATION, IN VIOLATION OF TITLE 18, UNITED STATES CODE
11 1153.

12 

13 Jeff Joe
14 Criminal Investigator
15 Navajo Department of Criminal
16 Investigations

17 Subscribed and sworn before me on
18 this 31st day of July, 2012

19 

20 United States Magistrate Judge

21 ROBERT HAYES SCOTT
22 UNITED STATES MAGISTRATE JUDGE
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